BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Commission's Investigation of Ohio's Retail Electric Service Market.

Case No. 12-3151-EL-COI

MOTION TO EXTEND DEADLINE FOR FILING REPLY COMMENTS OF THE RETAIL ENERGY SUPPLY ASSOCIATION

Now comes the Retail Energy Supply Association (RESA)¹, who, pursuant to Rule 4901-1-13 of the Ohio Administrative Code, moves for a one week extension until April 5, 2013 for the filing of reply comments in this matter. The current deadline for the filing of reply comments is March 29, 2013. Good cause exists for granting the one week extension which RESA proposes be applicable to all parties. The reasons supporting the requested extension are contained in the accompanying Memorandum in Support.

WHEREFORE, RESA respectfully requests that the Commission or its Attorney Examiner

grant a one week extension of time until April 5, 2013 for the filing of reply comments in this case.

Respectfully Submitted,

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M. Howard Petricoff (0008287) Stephen M. Howard (0022421) VORYS, SATER, SEYMOUR AND PEASE LLP 52 East Gay Street Columbus, Ohio 43216-1008 Tel. (614) 464-5414 <u>mhpetricoff@vorys.com</u> smhoward@vorys.com

Attorneys for the Retail Energy Supply Association

¹ RESA's members include: Champion Energy Services, LLC; ConEdison *Solutions*; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; Energy Plus Holdings, LLC; Exelon Energy Company; GDF SUEZ Energy Resources NA, Inc.; Green Mountain Energy Company; Hess Corporation; Integrys Energy Services, Inc.; Just Energy; Liberty Power; MXenergy; NextEra Energy Services; Noble Americas Energy Solutions LLC; PPL EnergyPlus; Reliant Energy Northeast LLC and TriEagle Energy, L.P. The responses expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

MEMORANDUM IN SUPPORT

By Entry of January 24, 2013, the current deadline for the filing of reply comments in this matter was set for Friday, March 29, 2013. The week of March 25, 2013 contains Good Friday, Easter, Passover and Spring Break for many. The week of March 25 also includes the 24th annual meeting of KEMA which involves energy consultants involving some of RESA's members. As the Commission is well aware, hearings are also going on at the Commission which occupy the time and resources of RESA and many other parties involved in this case.

With the advent of the March 29 deadline, RESA is experiencing difficulty in receiving final input from its over fifteen members in developing its reply comments. There were over twenty issues and twenty-seven different sets of initial comments filed. Given the complexity and scope of the issues addressed in the initial comments and the current timing for the reply comments, RESA submits that good cause exists for extending the deadline by one week until April 5, 2013. RESA respectfully requests that if the requested extension is granted, that it be made applicable to all parties.

The undersigned has contacted several of the parties who filed initial comments in this case. No one contacted has objected and Constellation NewEnergy, Inc. and Exelon Generation Company LLC, Dominion Retail, Inc., the Ohio Energy Group, Duke Energy Ohio and Hess Corporation each support the requested extension. WHEREFORE, the Retail Energy Supply Association respectfully requests that the deadline for filing reply comments in this matter be extended by seven days until April 5, 2013.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was served by electronic mail this 22nd day of March, 2013 upon the persons listed below.

Stephen M. Howard

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Summary: Motion Motion to Extend Deadline for Filing Reply Comments of the Retail Energy Supply Association electronically filed by Mr. Stephen M Howard on behalf of Retail Energy Supply Association